

155-07/MEU/LJK

FREEHILL HOGAN & MAHAR, LLP

Attorneys for Plaintiff

Sea Consortium Pte. Ltd.

80 Pine Street

New York, NY 10005

(212) 425-1900 / (212) 425-1901 (fax)

Michael E. Unger (MU 0045)

Lawrence J. Kahn (LK 5215)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SEA CONSORTIUM PTE. LTD.,

Plaintiff,

-against-

HRC SHIPPING LTD.,

Defendants.
-----X

07 CIV 2492 (PAC)

**NOTICE OF MOTION
FOR RECOVERY OF
ATTORNEYS FEES**

SIRS:

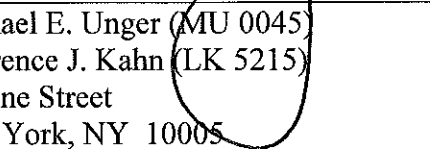
PLEASE TAKE NOTICE that Plaintiff SEA CONSORTIUM PTE. LTD., by its attorneys Freehill Hogan & Mahar, LLP, upon the annexed Declaration of Simon Stewart Davidson and Affirmation of Michael Unger, together with all accompanying exhibits, the accompanying Memorandum of Law, and the pleadings and proceedings previously had between the parties, WILL MOVE THIS COURT, before the Honorable Paul A. Crotty, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 20-C, New York, New York, at a time and place to be established by the Court, for an Order awarding it attorneys fees and costs incurred in pursuing Defendant for collection, together with such other, further and different relief as the Court may deem just and proper in the premises.

PLEASE TAKE FURTHER NOTICE that opposing papers, if any, and reply papers, if any, must be served pursuant to the schedule established by the Court at the conference held on March 25, 2008.

Dated: New York, New York
April 4, 2008

FREEHILL HOGAN & MAHAR, LLP
Attorneys for Plaintiff
Sea Consortium Pte. Ltd.

By:



Michael E. Unger (MU 0045)
Lawrence J. Kahn (LK 5215)
80 Pine Street
New York, NY 10005
(212) 425-1900 / (212) 425-1901 (fax)

To: Neil A. Quartaro, Esq.
Watson Farley & Williams (New York), LLP
Attorneys for Defendant HRC Shipping Ltd.
100 Park Avenue
New York, NY 10017